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Attorney for Plaintiff Patent Enforcement Group L.L.C.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PATENT ENFORCEMENT GROUP, L.L.C.,
An Oregon Limited Liability Company,

Plaintiff,

v.

CHASSIS TECH, LLC, an Arizona Limited
Liability Company, STREET PROS, INC., a
dissolved California Corporation, JOSEPH F
MARECEK, a California resident, SOUND
CONCEPTIONS, INC., a New Jersey
Corporation, A1 ELECTRIC AUTOMOTIVE
ACCESSORIES, a California Corporation,
JOHN BOBSON, DBA
MERCEDES WHEELS.COM, an Oregon
resident, METRA ELECTRONICS, a Florida
Corporation, SONIC ELECTRONIX, INC., a
California corporation, TPI TECH, INC., a
Florida corporation, MICRO ALARM
SYSTEMS, INC., a California corporation, and
ELECTRIC LIFE, INC, an Illinois corporation,

Defendants.

Case No. **CV 11-925 BR**

COMPLAINT

Patent Infringement – 35 U.S.C. § 271

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT:

PARTIES

1.

Plaintiff, Patent Enforcement Group, LLC, is an Oregon Limited Liability Company. It is the assignee of 100% of the rights to U.S. Patent Number 6,711,856 which is described below.

2.

Defendant CHASSIS TECH, LLC is an an Arizona Limited Liability Company doing business throughout the country through its web sites www.AIRBAGIT.COM and www.CHASSISTECH.COM.

3.

Defendant STREET PROS, INC., is a dissolved California Corporation and/or an assumed business name of JOSEPH F MARECEK, a California resident doing business throughout the country through its or his web site www.STREETPROS.COM.

4.

Defendant SOUND CONCEPTIONS, INC. is a New Jersey corporation doing business throughout the country through its web site www.AUTOTOYS.COM.

5.

Defendant A1 ELECTRIC AUTOMOTIVE ACCESSORIES, is a California Corporation, doing business throughout the country through its web site www.A1ELECTRIC.COM.

6.

Defendant JOHN BOBSON is an Oregon resident, doing business throughout the country through his web site ww.MERCEDESWHEELS.COM.

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Defendant METRA ELECTRONICS, is a Florida Corporation doing business throughout the country through its web site www.METRAONLINE.COM.

8.

Defendant SONIC ELECTRONIX, INC., is a California corporation, doing business throughout the country through its web site WWW.SONICELECTRONIX.COM.

9.

Defendant TPI TECH, INC. is a Florida limited liability company doing business throughout the country through its web site WWW.ITSASNAPWIREANDCABLE.COM.

10.

Defendant MICRO ALARM SYSTEMS, INC., is a California corporation doing business throughout the country through its web site .WWW.MICROALARM.COM.

11.

Defendant ELECTRIC LIFE, INC, is an Illinois corporation doing business throughout the country through its web site .WWW.ELECTRIC-LIFE.COM.

JURISDICTION

12.

This is a civil action for patent infringement, injunctive relief, and damages arising under the United States Patent Act, 35 U.S.C. §§ 1, *et seq.* This Court has subject matter jurisdiction of the claims asserted herein under 28 U.S.C. §§ 1331 and 1338(a).

13.

This Court has *in personam jurisdiction* over Defendants because they conduct business within Oregon, the forum state, and have committed acts of patent infringement in this District. Defendants advertise and interactively sell the infringing product on their websites alleged

above, the website EBAY.com, the website AMAZON.COM and / or advertise in print media or periodicals distributed in Oregon or on broadcast media receivable in Oregon.

Each defendant has systematic and continuous contacts with the State of Oregon and has purposefully availed itself the privilege of conducting activities in Oregon by soliciting and/or conducting business transactions in Oregon.

VENUE

14.

A substantial part of the acts, events and omissions giving rise to the claims asserted in this action occurred within this judicial District, and venue is therefore proper in this court under the provisions of 28 U.S.C. §§ 1391(b) and (c), and 1400(b).

THE PATENT IN SUIT

15.

On March 30, 2004, U.S. Patent No. 6,711,856 ("the '856" patent") entitled "Door Opener Assist Device" was duly and legally issued to Drew Hoffman, Mr. Hoffman and his successors in interest subsequently assigned the entire right, title and interest in and to the '856 patent to Patent Enforcement Group, LLC. A copy of the patent is attached as EXHIBIT A.

16.

Plaintiff's predecessor-in-interest, The Hoffman Group L.L.C., has fully complied with all the requirements of 35 U.S.C. § 287(a) to ensure constructive notice be accorded by affixing the word "patent" or the abbreviation "pat", together with the number of the patent (6,711,856), on all packaging of apparatuses which embody the patented invention and are manufactured or sold by Plaintiff.

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For its complaint against defendants, plaintiff alleges the following:

CLAIM FOR RELIEF
(Patent Infringement)

17.

In violation of 35 U.S.C. § 271 (a), (b) and (c), Defendants, and each of them have infringed and continue to infringe directly or under the doctrine of equivalents; have induced and continue to induce others to infringe; and/or have committed and continue to commit acts of contributory infringement of one or more of the claims of the '856 patent. Defendants' infringing activities in the United States and in this District include manufacture, use, sale and offer for sale of certain door poppers in both a retail and wholesale capacity.

18.

Defendants offer the infringing product for sale and also for sale as part of a larger assemblage, or kit to which the infringing product provides necessary function and of which it is an integral part.

19.

As a consequence of the infringing activities of Defendants, and each of them, regarding the '856 patent as complained of herein, Patent Enforcement Group, L.L.C. has suffered monetary damages in an amount not yet determined and will continue to suffer serious irreparable injury unless Defendants' infringement of the '856 patent is enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests and prays that this Court enter judgment in its favor against defendants, and each of them, and grant the following relief:

A. A judgment declaring that defendants' conduct has infringed, induced others to infringe, and/or committed acts of contributory infringement with respect to the '856 patent in

violation of 35 U.S.C. §§ 271 (a), (b) and (c);

B. A judgment that Defendants' infringements of the '856 patent have been wilful and wanton;

C. Immediately and permanently enjoining Defendants, their officers, directors, agents, servants, employees, representatives, attorneys, related companies, successors, assigns and all others in active concert or participation with them, from any further acts of infringement, inducement of infringement, or contributory infringement of the '856 patent;

D. An order pursuant to 35 U.S.C. § 284, awarding Plaintiff damages adequate to compensate Plaintiff for Defendants' infringement of the '856 patent, in an amount to be determined at trial, but in no event less than a reasonable royalty on the products or the kits of which they comprise a part;

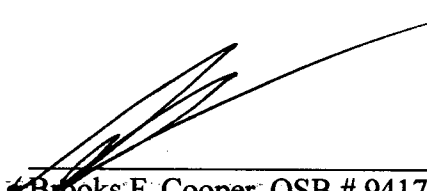
E. An order pursuant to 35 U.S.C. § 284, and based on Defendants' willful and wanton infringements of the '856 patent, trebling all damages awarded to Plaintiff;

F. An order, pursuant to 35 U.S.C. § 284, awarding to Plaintiff pre-judgment and post-judgment interest on the damages and its costs incurred in this action;

G. An order, pursuant to 35 U.S.C. § 285 directing Defendants to deliver to Plaintiff, for destruction at Plaintiff's option, all products that infringe the '856 patent; and

H. Awarding plaintiff such other relief as the Court may deem just and equitable.

DATED this 4th day of August, 2011.

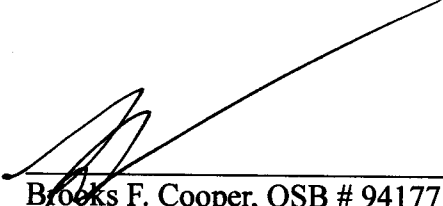


Brooks F. Cooper, OSB # 94177
Of Attorneys for Plaintiff, Patent
Enforcement Group, LLC

DEMAND FOR JURY TRIAL

Plaintiff Demands a trial by jury of all claims where it is so entitled, pursuant to FRCP
38(b).

DATED this 4th day of August, 2011.



Brooks F. Cooper, OSB # 94177
Of Attorneys for Plaintiff, Patent
Enforcement Group, LLC